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February 6, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: Level 3 Communications, LLC
Certification of CPNI Filing (2-6-06)
EB Docket No. 06-36
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),² Level 3 Communications, LLC ("Level 3") submits this Compliance Statement and Certificate.

Very Truly Yours,


Gregg Strumberger
Regulatory Counsel

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com
John M. Ryan, Senior Vice President, Regulatory and Public Policy

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2001, *et seq.*

Level 3 Communications, LLC
CPNI Compliance Statement (EB-06-TC-060)

Level 3 Communications, LLC (“Level 3”) is a competitive wholesale telecommunications carrier providing services in all 50 states. Level 3 provides wholesale telecommunications, Internet, managed connectivity, collocation, fiber and private line services to carriers and enhanced service providers and private line services to a limited number of enterprise customers. As such, Level 3 has knowledge of end user customer proprietary network information (“CPNI”) only insofar as it is necessary for the provision and maintenance of service to its wholesale customers. Nevertheless, protecting even this limited end user CPNI, and the CPNI of our carrier customers, is an important obligation for all telecommunications carriers and Level 3 has put into practice various operational procedures to assure that, consistent with the Commission’s rules, all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

As permitted by the CPNI rules, Level 3 uses CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of Level 3, other users or other carriers from unlawful use; (3) to provide any administrative services for the duration of a call; (4) for the purpose of providing carrier premises equipment (“CPE”) and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services. Level 3 only uses, discloses or permits access to CPNI for marketing purposes in the context of marketing services within the same category to existing customers. For instance, Level 3 may use CPNI to market a higher capacity circuit to a carrier customer who is over utilizing its current circuit.

Level 3 takes significant steps to protect CPNI in its possession. All wholesale call detail records are maintained in secure data warehouse databases. Customers are provided their wholesale call detail records using a secure FTP site. They are provided access only to their own information and are not able to access information for any other customer or entity. Internal access to the data warehouses is limited to only necessary Level 3 personnel. These databases are password and firewall protected and all data security policies are in compliance with Sarbanes Oxley requirements. Level 3 additionally assures the security of any data residing on its physical network through measures such as access controls, security systems and continuous monitoring.

In addition, Level 3 requires all customers to execute non-disclosure agreements to protect any proprietary information known by either company. All details of the customer relationship remain confidential unless the customer consents to a specific disclosure of the relationship or its general terms.

Level 3 does not currently engage in any large-scale coordinated sales and marketing campaigns and generally markets services to new and existing customers on a case-by-case basis. Information used in any marketing or sales efforts is limited to non-proprietary customer information. For example, sales personnel may only use customer information to the extent that it is public information that has appeared in a published press release. Although this information is not of the nature protected as CPNI, Level 3 is taking significant steps to assure that any information in its possession is used only as agreed to by the customer. As part of its recent acquisition of WilTel Communications, Level 3 is reviewing and revamping its sales policies and training materials and is developing a database which will identify what customer information has been made public. All press releases and other marketing materials are maintained indefinitely. This database and the policy and training modifications are part of the Level 3 – WilTel integration and will be in place by the end of first quarter 2006.

In order to protect from internal unauthorized release of CPNI, all Level 3 employees are required to abide by the company's Code of Conduct, which requires employees to maintain the confidentiality of all information, including CPNI, that is obtained as result of their employment by Level 3. Employees who violate the Code of Conduct are subject to discipline, including possible termination. In addition, each employee of Level 3 signs a Confidentiality Agreement that survives termination and mandates that the employee protect the confidentiality of any information obtained during their period of employment.

Level 3 does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other related third party for the purposes of marketing any services. Level 3 does not share, sell, lease or otherwise provide CPNI to any unrelated third parties.

STATE OF COLORADO)
) ss.
COUNTY OF BROOMFIELD)

LEVEL 3 COMMUNICATIONS, LLC
CERTIFICATE OF CPNI COMPLIANCE (EB-06-TC-060)

That the undersigned does hereby certify the following:

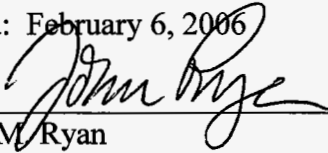
1. I, John Ryan, am Senior Vice President of Regulatory and Public Policy for Level 3 Communications, LLC ("Level 3"). I am authorized to make this certification on behalf of Level 3.

2. Level 3 has established operating procedures that adequately ensure Level 3's continued compliance with Part 64, Subpart U, of the rules of the Federal Communications Commission pertaining to customer proprietary network information ("CPNI"). Level 3's applicable operating procedures are more fully described in the attached Compliance Statement, which is incorporated herein by reference.

3. This Certification of CPNI Compliance covers the time period beginning January 1, 2005 and ending December 31, 2005.

4. The foregoing statements are based upon my own personal knowledge, and the facts contained in the attached Statement are true and correct to the best of my knowledge, information and belief.

Dated: February 6, 2006




John M. Ryan
Senior Vice President, Regulatory and Public Policy
Level 3 Communications, LLC

Subscribed and sworn to before me, a notary public in and for said county and state, this 6th day of February, 2006.

My Commission Expires:

11/18/07



Notary Public

